



U.S. Department of Justice

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September 3, 2021

Honorable George C. Hanks, Jr.
United States District Court
Southern District of Texas

Re: Status of cause no. 4:19-CR-832; United States v. Gerald M. Goines, et. al.

Judge Hanks:

The United States and Gerald Goines jointly propose the Court set a status hearing date for Monday, December 13, 2021.

When the parties last appeared before the Court on March 3, 2020, it was prior to the institution of COVID-19 related stay-at-home orders in Texas. Since then, the COVID-19 pandemic has placed restrictions on all the parties and has affected the ability of each party to review discovery, meet with witnesses and clients, engage in case-related discussions with opposing counsel, and prepare for trial. Almost 18 months into the pandemic and its restrictions, and there are still uncertainties as to when and how the above restrictions will lessen. In addition, discovery is still ongoing.

Finally, because of the case's complexities, the parties respectfully request the Court set a status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for Monday, December 13, 2021, at which time the parties are hopeful they will be in a better position to propose dates for motions deadlines, pretrial conference and trial.

Respectfully submitted,

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